

Response to USEPA Comments on

Initial Site Review Work Plan

Draft

Dated: December 3, 2019

American Zinc Products, LLC

Mooreboro, NC

NCR 000 159 038

**General Comment**

All elements required in the ISR Work Plan, as described in Section 88.a. of the 3013 Order, which will be used to prepare the ISR Report are discussed in Section 6.0 of the Draft ISR Work Plan.

**Response: No response required.**

**Specific Comments**

1. Section 5.0

The areas described in Section 5.0 do not match with the names of some of the areas depicted on Figure 1 – Site Plan. For example, are West Ponds (Section 5.0) the same as Stormwater West Ponds (Figure 1)?

**Response: Yes, the West Ponds referenced in Section 5.0 are the same as the Stormwater West Ponds shown on Figure 1. All areas will be consistently identified in the ISR Report.**

2. Section 5.0

There are no descriptions of Solvent Extraction (Area 200) and Bleed Treatment (Area 300). These two areas are listed in Section 2.0 and shown on Figure 1 but are not described in Section 5.

**Response: Further descriptions of these areas will be provided in the ISR Report.**

3. Figure 1 – Site Plan

Some areas in the Legend do not correspond to areas depicted on the Site Plan (aerial photograph). For example, in the Legend, WOX Washing is shown bounded by a turquoise color box, but on the Site Plan it is shown bounded by an orange box.

**Response: These discrepancies will be corrected in the ISR Report.**

4. Figure 1 – Site Plan

Due south of the area labeled Storm Water West Ponds is a white-roofed building. On the south side of this building there appears to be a retaining wall and gray material piled against it. What is this area and what is the gray material?

**Response: A description of this area will be included in the ISR Report.**

5. Provide an aerial photograph showing the facility boundary.

**Response: The facility boundary will be clearly identified on an aerial figure in the ISR Report.**

**Response to NC HWS Comments on December 2019 Initial Site Review  
Workplan American Zinc Products Facility  
484 Hicks Grove Road  
Mooresboro, North Carolina  
NCR 000 159 038**

1. As part of the site review report, AZP should provide a table listing all hazardous constituents used at, produced or generated (including any byproducts), or shipped to or from the Facility. This should include all constituents found or potentially found in the WOX, zinc concentrate, “final residue”, “impurities” from the raffinate process, bleed treatment residues, zinc organic concentrate filter cake, leach residues, waste casting material, iron-rich material (IRM), and any other material utilized at the site;

**Response: Consistent with the ISR Work Plan, the ISR Report will address materials used, produced, generated, or shipped to or from the Facility for the purpose of identifying confirmed or potential releases of hazardous waste and/or hazardous constituents at or from the Facility.**

2. Some materials removed from the West Ponds and the East Ponds were sampled and sent offsite as hazardous wastes. The Initial Site Review Report (Report) should identify which units managed these hazardous wastes. In the Report, the Facility should detail why these Ponds should not be considered units (surface impoundments) that managed (or are managing) hazardous wastes;

**Response: The ISR Report will address the Ponds and relevant shipments of hazardous waste from the facility.**

3. Section 3.0 of the Workplan discusses a January 7, 2014 letter from the HWS concerning the status of materials proposed to be generated at the Facility. The January 7, 2014 letter was based on information provided to the HWS at that time and prior to the Facility beginning operations. The January 7, 2014 letter did not include a determination of the regulatory status of the incoming WOX material.

**Response: The ISR Report will address incoming WOX as part of the assessment.**

4. Section 6.0 of the Workplan indicates 12 areas of concern were identified in the Consent Order. The Facility should include plans to investigate any additional areas of concern (such as the rail car washing area) not identified in the Order that are identified during the site review process;

**Response: The ISR Report will address all AOCs identified during the Initial Site Review. Pursuant to Paragraph 88(c) of the Section 3013 Consent Order, following EPA approval of the ISR AZP will prepare and submit a Sampling and Analysis Work Plan proposing investigation where appropriate for AOCs identified in the ISR Report.**

5. The ISR Report should identify areas at the facility where IRM has been placed;

**Response: The ISR Report will note any area where IRM is known to be present.**

6. The ISR Report should identify all hazardous waste central accumulation areas currently or formerly utilized at the site. The ISR Report should provide a description of and the potential for release from these areas.

**Response: The ISR Report will identify all historical and current hazardous waste central**

**accumulation areas and address the potential for releases from those areas.**